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March 21, 2024

Clerk of the United States District Court
For the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: "Group 1 PFAS Cases"

Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573

Lombardo, et al. v. Solvay, et al.
Case No.: 1:20-cv-15014

Lloyd, et al. v. Solvay, et al.
Case No.: 1:21-cv-9705

Briggs, et al. v. Solvay, et al.
Case No.: 1:21-cv-9699

Britton, et al. v. Solvay, et al.
Case No.: 1:21-cv-9707

Gouse, et al. v. Solvay, et al.
Case No.: 1:21-cv-9711

Philipp, et al. v. Solvay, et al.
Case No.: 1:21-cv-9714

Callis, et al. v. Solvay, et al.
Case No.: 1:21-cv-15212

Malinowski, et al. v. Solvay, et al.
Case No.: 1:22-cv-3214

Powell, et al. v. Solvay, et al.
Case No.: 1:22-cv-3218

Dear Sir or Madam:

I represent Plaintiffs in the above-captioned "Group 1" matters, and write with the consent of all Defendants to respectfully request that the Court schedule "Friendly Hearings" to approve proposed settlements for the nine (9) minor Plaintiffs and to request that those hearings be conducted by magistrate Judge Ann Marie Donio.

By way of brief background, these cases are part of a group of cases involving allegations of ground water contaminated with PFAS chemicals. This Court designated these cases to various "Groups" based upon who the Plaintiffs are and what claims they asserted. "Group 1" cases refer to individual Plaintiffs with private wells who brought claims against Defendants for property devaluation, medical monitoring, and nuisance. These cases are identified above and are the subject of this request.¹ "Group 1" cases involve 19 separate households, and 51 individual Plaintiffs – nine of whom are minor Plaintiffs requiring court approval for their proposed settlements.

There is currently a "Friendly Hearing" scheduled for June 13, 2024 in the "Group 3" cases, which is separate and unrelated to the above-identified cases. A separate date for "Friendly Hearings" must be scheduled for the nine minor Plaintiffs in "Group 1". Those nine minor Plaintiffs include the following individuals:

1. L.K. – A minor Plaintiff under the caption:
Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573
2. G.K. – A minor Plaintiff under the caption:
Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573
3. A.F. – A minor Plaintiff under the caption:
Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573
4. G.F. – A minor Plaintiff under the caption:
Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573
5. C.F. – A minor Plaintiff under the caption:
Giordano, et al. v. Solvay, et al.
Case No.: 1:19-cv-21573

¹ The other cases are "Group 2" cases, which involve individual Plaintiffs bringing personal injury claims; "Group 3" cases which involves a class action lawsuit on behalf of the residents of the Borough of National Park; and "Group 4" cases, which involves a cost recovery action on behalf of the Borough of National Park.

6. C.G. - A minor Plaintiff under the caption:
Gouse, et al. v. Solvay, et al.
Case No.: 1:21-cv-9711
7. Z.B. - A minor Plaintiff under the caption:
Britton, et al. v. Solvay, et al.
Case No.: 1:21-cv-9707
8. J.M. - A minor Plaintiff under the caption:
Malinowski, et al. v. Solvay, et al.
Case No.: 1:22-cv-3214
9. L.M. - A minor Plaintiff under the caption:
Malinowski, et al. v. Solvay, et al.
Case No.: 1:22-cv-3214

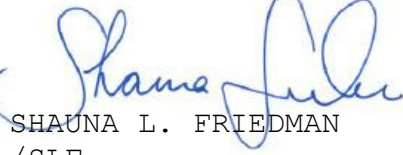
Because of the complexity of these cases, and the long history of litigation, the parties have consented to, and respectfully request, that Magistrate Judge Ann Marie Donio be permitted to hold these "Friendly Hearings" as she has great familiarity with these cases and helped the parties reach a resolution in these matters.

It is further respectfully requested that these "Friendly Hearings" all be scheduled to proceed on one day. Given the significant overlap in issues, and the fact that the nine minor Plaintiffs come from only five Plaintiff families, the parties believe that all nine hearings can efficiently be addressed in a single day.

The parties thank the Court for its consideration of these requests. If there is any additional information needed, please do not hesitate to contact me.

Respectfully submitted,

BARRY, CORRADO & GRASSI, P.C.


SHAUNA L. FRIEDMAN
/SLF

cc: All counsel of record
Magistrate Judge Ann Marie Donio